

**IN THE UNITED STATES DISTRICT COURT
IN THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Mary Norum, n/k/a/ Calabrese)	
)	
Plaintiff,)	
)	
v.)	No. 08 C 2963
)	
MRC Receivables Corporation, a Delaware)	Judge Wayne R. Andersen
corporation, Midland Credit Management,)	
Inc., a Kansas corporation, and Blitt and)	Magistrate Judge Valdez
Gaines, P.c., an Illinois professional)	
corporation,)	
)	
Defendants.)	

**AGREED MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants MRC Receivables Corporation and Midland Credit Management, Inc. (collectively referred to as "Defendants"), by and through their attorneys, Dykema Gossett PLLC, move pursuant to Fed. R. Civ. P. 6(b), for an enlargement of time for Defendants to respond to Plaintiff's Complaint ("Complaint"). In support of their agreed motion, Defendants state the following:

1. Plaintiff filed her Complaint on May 21, 2008.
2. Defendants' response to the Complaint is currently due on June 12, 2008.
3. Counsel for Defendants was only recently retained and requires additional time to properly investigate the allegations and formulate an appropriate response.
4. On June 12, 2008, Defendants' counsel contacted counsel for Plaintiff who kindly agreed to a thirty (30) day enlargement of time, up to and including July 14, 2008.
5. This request for an extension is not meant for the purposes of undue delay, and no party will be prejudiced by this extension.

WHEREFORE, defendants MRC Receivables Corporation and Midland Credit Management, Inc. respectfully request that this Court grant them an enlargement of time up to and including July 14, 2008, in which to respond to Plaintiff's Complaint, and grant such further and additional relief as this Court deems just and appropriate.

Dated: June 12, 2008

Respectfully submitted,

**MRC RECEIVABLES CORPORATION and
MIDLAND CREDIT MANAGEMENT, INC.**

By: s/ Renee L. Zipprich
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CERTIFICATE OF SERVICE

I hereby certify that on **June 12, 2008**, I electronically filed the foregoing **Agreed Motion for Enlargement of Time to Respond to Plaintiff's Complaint** with the Clerk of the Court using the ECF system, which sent notification to the following:

David J. Philipps (davephilipps@aol.com)
Mary Elizabeth Philipps (mephilipps@aol.com)

s/ Irina V. Frye

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